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December 19, 2024

VIA CM-ECF

The Honorable Christopher J. Burke
J. Caleb Boggs Federal Building
844 N. King Street
Wilmington, DE 19801-3555

Re: *Sage Chemical, Inc. et al. v. Supernus Pharmaceuticals, Inc. et al.*
C.A. No. 22-1302-CJB

Dear Judge Burke:

Counsel to Sage Chemical, Inc. and TruPharma, LLC (collectively, “Plaintiffs”), US WorldMeds Partners, LLC and USWM, LLC (collectively, “USWM”), and Supernus Pharmaceuticals, Inc., MDD US Enterprises, LLC, and MDD US Operations, LLC (collectively, “Supernus”) in the above-referenced matter write to request the scheduling of a discovery hearing.

The following attorneys, including at least one Delaware Counsel and at least one Counsel per party, participated in a verbal meet-and-confer by telephone on the following date(s):

July 21, 2023

| Delaware Counsel for Plaintiffs | Party Counsel for Plaintiffs |
|---------------------------------|------------------------------|
| Jennifer Cree | Susannah Torpey |
| | Aliana Knoepfler |

| Delaware Counsel for USWM | Party Counsel for USWM |
|---------------------------|------------------------|
| Alexandra Joyce | Eric Stock |
| | Josh Obear |
| | Suzi Kondic |

October 31, 2023

| Delaware Counsel for Plaintiffs | Party Counsel for Plaintiffs |
|---------------------------------|------------------------------|
| Jennifer Cree | Susannah Torpey |
| | Aliana Knoepfler |

| Delaware Counsel for USWM | Party Counsel for USWM |
|----------------------------------|-------------------------------|
| Daniel Silver | Eric Stock |
| | Josh Obear |

January 10, 2024

| Delaware Counsel for Plaintiffs | Party Counsel for Plaintiffs |
|----------------------------------------|-------------------------------------|
| Dominick Gattuso | Susannah Torpey |
| | Aliana Knoepfler |

| Delaware Counsel for USWM | Party Counsel for USWM |
|----------------------------------|-------------------------------|
| Alexandra Joyce | Eric Stock |
| | Josh Obear |

October 11, 2024

| Delaware Counsel for Plaintiffs | Party Counsel for Plaintiffs |
|----------------------------------------|-------------------------------------|
| Dominick Gattuso | Matthew Olsen |
| | Aliana Knoepfler |

| Delaware Counsel for Supernus | Party Counsel for Supernus |
|--------------------------------------|-----------------------------------|
| Michelle Streifthau-Livizos | David Shotlander |
| | Jordan Rosenfeld |

| Delaware Counsel for USWM | Party Counsel for USWM |
|----------------------------------|-------------------------------|
| Daniel Silver | Eric Stock |
| | Kate Swisher |
| | Josh Obear |

November 1, 2024

| Delaware Counsel for Plaintiffs | Party Counsel for Plaintiffs |
|----------------------------------------|-------------------------------------|
| Dominick Gattuso | Susannah Torpey |
| | Aliana Knoepfler |
| | Calvin Kim |

| Delaware Counsel for Supernus | Party Counsel for Supernus |
|--------------------------------------|-----------------------------------|
| Michelle Streifthau-Livizos | David Shotlander |
| | Ali Berkin |

The disputes requiring judicial attention at this time are listed below:

- Whether USWM LLC should be required to undertake a search for and produce, in response to Plaintiffs' Request for Production No. 64, transcripts, sworn statements, and documents produced by US WorldMeds, LLC in connection with *United States ex rel. Bennett v. US WorldMeds, LLC*, No. 3:13-cv-363 (SRU) and *United States ex rel. Chinnapongse v. US WorldMeds, LLC*, No. 3:16-cv-804 (SRU) in the District of Connecticut.
- Whether any documents responsive to Plaintiffs' Request for Production No. 64 that are related to a prior litigation against US WorldMeds, LLC and are in USWM LLC's possession are also within the control of MDD US Operations, LLC f/k/a US WorldMeds, LLC.

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and MDD US Operations, LLC*

Dated: December 19, 2024